

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 3:06cr266-WKW
)	
PAUL EUGENE WEBSTER)	

UNITED STATES' SUPPLEMENTAL JURY INSTRUCTION

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and respectfully requests that the following Supplemental Jury Instruction be given to the jury in the above-styled case.

Respectfully submitted this the 9th day of January, 2007.

LEURA G. CANARY
UNITED STATES ATTORNEY

s/Tommie Brown Hardwick
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ASB4152 W86T

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CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to: Jennifer Hart, Esquire.

Respectfully submitted,

s/Tommie Brown Hardwick
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GOVERNMENT’S SUPPLEMENTAL JURY INSTRUCTION NO. 1

STRICT LIABILITY OFFENSE

The law recognizes that the crime of being a felon in possession of a firearm “is a strict liability offense” and , consequently, does not require the prosecution to prove that the criminal acts were done with specific criminal intent. To establish that a defendant acted “knowingly,” the prosecution is not required to prove that the defendant knew that his possession of a firearm was unlawful.¹ “The crime of being a felon in possession of a firearm is easily understood. Possession alone is sufficient. The crime does not require any specific intent.” *Id.*

¹ *United States v. Deleveaux*, 205 F.3d 1292, 1298 (11th Cir. 2000), *See also United States v. Thompson*, 25 F.3d 1558, 1563-64 (11th Cir. 1994).